UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

MARLON QUAN, ACORN CAPITAL GROUP, LLC AND STEWARDSHIP INVESTMENT ADVISORS, LLC,

Defendants,

and

ASSET BASED RESOURCE GROUP, LLC AND FLORENE QUAN,

Relief Defendants.

Civil No. 11-723 ADM/JSM

NOTICE OF HEARING ON DEFENDANTS' MOTION FOR THE LIMITED RELEASE OF FUNDS FOR THE DEFENSE OF STEWARDSHIP CREDIT ARBITRAGE FUND, LLC AGAINST CIVIL CLAIMS

NOTICE OF HEARING

PLEASE TAKE NOTICE that on **February 8, 2012, at 9:30 a.m.** (CST) before the Honorable Anne D. Montgomery, Judge of the United States District Court, U.S. Courthouse, 300 South Fourth Street, Suite 13W, Minneapolis, MN 55415, defendants Marlon Quan, Acorn Capital Group, LLC, and Stewardship Investment Advisors, LLC will move the Court for an order granting the limited release of funds so that Stewardship Credit Arbitrage Fund, LLC ("SCAF") may retain counsel and defend itself against civil claims.

Dated: January 20, 2012 Respectfully submitted,

/s Thomas J. Radio
Thomas J. Radio (Reg. No. 137029)
Best & Flanagan LLP
225 South Sixth Street, Suite 4000
Minneapolis, Minnesota 55402
(612) 349-5680
tradio@bestlaw.com

Bruce E. Coolidge (Reg. No. 278952)
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
(202) 663-6376
bruce.coolidge@wilmerhale.com
(admitted *pro hac vice*)

Brian R. Michael (Reg. No. 240560)
Wilmer Cutler Pickering Hale and Dorr LLP
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
(213) 443-5374
brian.michael@wilmerhale.com
(admitted *pro hac vice*)

Attorneys for Defendants Marlon Quan, Acorn Capital Group, LLC, and Stewardship Investment Advisors, LLC, and Relief Defendant Florene Quan